

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA

Plaintiff

V.

ROLANDO R. GONZALEZ-TREVINO,

Defendant

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CRIMINAL NO. SA-14-CR-0338-OG

MOTION FOR RELEASE OF DEFENDANT FROM DETENTION

COMES NOW Rolando R. Gonzalez-Trevino, Defendant in the above styled and numbered cause, and files this Motion for Release of Defendant from Detention pursuant to 18 U.S.C. § 3142(f) for the court to consider the release of Defendant pending sentencing. In support, Defendant shows the following:

I.

Procedural Background: On April 30, 2014, Defendant was indicted by a grand jury in the Western District of Texas on charges of Conspiracy to Commit Wire Fraud (18 U.S.C § 1349, 343), Conspiracy to Transport or Cause to be Transported Stolen Property (18 U.S.C § 371, 2314), and Conspiracy to Commit Money Laundering (18 U.S.C. § 1956 (h), (a)(2)(B)). Defendant was arrested on these charges when he flew from Mexico to Las Vegas, Nevada on October 31, 2014. An initial appearance was held on November 3, 2014 in the United States District Court, District of Nevada, Las Vegas Division. On May 27, 2015 Defendant plead guilty to one count of Conspiracy to Transport Stolen Money.

II.

Under the terms of the Defendant's plea, he has served time within the statutory range of

punishment, and is eligible to receive probation. Accordingly, Defendant moves to be released from Detention pending sentencing.

III.

Defendant requests the opportunity to have a hearing to demonstrate he may provide sufficient surety to guarantee his appearance under the terms of the Bail Reform Act.

WHEREFORE, PREMISES CONSIDERED, the Defendant prays that this motion be granted.

Respectfully submitted,

Brandon T. Hudson
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1815 San Pedro Avenue
San Antonio, Texas 78212
(210) 222-2297
FAX: (210) 222-9101

BY: /s/ Brandon T. Hudson, Esq.

BRANDON HUDSON
Attorney for Defendant
State Bar No. 50511660

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document was forwarded to the United State's Attorney's Office, 601 N.W. Loop 410, Suite 600, San Antonio, Texas 78216, on this the 18thth day of June, 2015.

/s/ Brandon T. Hudson, Esq.
BRANDON HUDSON

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ORDER

On this day came on to be heard Defendant's Motion for Release from Detention, and said motion is hereby:

GRANTED

DENIED to which ruling the Defendant timely noted an exception.

SET FOR HEARING ON THE _____ day of _____, 20____, at
_____ o'clock _____.

SIGNED AND ENTERED this day _____ of _____, 20____.

JUDGE PRESIDING